

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LEIGHTON TECHNOLOGIES LLC,

Plaintiff,

vs.

OBERTHUR CARD SYSTEMS, S.A. and
OBERTHUR CARD SYSTEMS OF
AMERICA CORPORATION,

Defendants.

OBERTHUR CARD SYSTEMS, S.A. and
OBERTHUR CARD SYSTEMS OF
AMERICA CORPORATION,

Counterclaim Plaintiffs,

vs.

LEIGHTON TECHNOLOGIES LLC,
GENERAL PATENT CORPORATION
INTERNATIONAL, GENERAL PATENT
CORPORATION, and IP HOLDINGS LLC,

Counterclaim Defendants.

Case No: 04 CV 02496 (CM) (LMS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure and in accordance with the Court's Individual Rules of practice, and upon the accompanying Memorandum of Law in Support of Defendants' Motion for Summary Judgment for Non-Infringement, Statement of Material Facts Pursuant to Local Civil Rule 56.1, the Declarations of Kevin P.B. Johnson and Dr. David Kazmer, both dated November 29, 2006, all exhibits and documents mentioned therein, and upon the pleadings and all prior proceedings herein, defendants Oberthur Card Systems, S.A. and Oberthur Card Systems of America Corporation (collectively "Oberthur") hereby move this Court, before the Honorable Colleen

McMahon, for an order (i) granting summary judgment that Oberthur does not infringe any patent claims asserted by plaintiff Leighton Technologies LLC, and (ii) granting such other and further relief as the Court deems just and proper.

DATED: November 29, 2006

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

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America Corporation*

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, if any, on this 29th day of November, 2006.

/s/ Edward J. DeFranco (ED-6524)